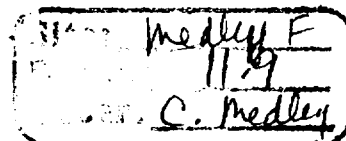


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CERTIFIED MAIL
RETURN RECEIPT REQUESTED

AND-ER

Mr. Clyde Medley
Route 7
Pacolet Road
Gaffney, South Carolina 29304

RE: Medley Farm Site
Gaffney, South Carolina

Dear Mr. Medley:

The United States Environmental Protection Agency (EPA) from June 1983 until July 1983 spent approximately \$600,000 in federal funds removing hazardous substances and chemical wastes from the above-mentioned, abandoned site. This action was taken pursuant to Section 104 and other provisions of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, 42 U.S.C. 9601 et seq. (CERCLA). Under Section 107(a) of CERCLA and other laws, responsible parties may be liable for any costs incurred by the government in taking corrective actions at the site. Such costs may include, but may not be limited to, expenditures for investigation, planning, cleanup of the site and enforcement.

Responsible parties under CERCLA include the current and past owner or operator, and persons who are involved in the disposal or treatment or who arranged for the transportation of hazardous substances for the purpose of treatment or disposal at the site. By this letter, therefore, EPA intends to both notify you of your potential liability with regard to this matter and to obtain certain information from you for possible enforcement action against you and other potentially responsible parties.

Under the provisions of Section 104 of CERCLA, 42 U.S.C. 9604, and Section 3007 of the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. 6927, as amended by the Solid Waste Disposal Act Amendments of 1980, the Administrator of the Environmental Protection Agency has the authority to require any person who generates, stores, treats, transports, disposes of, or otherwise handles or has handled hazardous wastes and substances to furnish information related to such wastes and substances. Pursuant to these statutory provisions, you are hereby requested to provide the following information:

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1. The name, address, and telephone number of all persons or companies involved in the arrangements and transactions which resulted in the storage of containers of hazardous substances on the above-mentioned property.
2. A brief description of each arrangement or transaction with the person or companies identified in question 1 with particular attention to the types and quantities of waste taken to the site.
3. The date and nature of all permits received by you or your company from state or federal agencies for any type of operation at the above-referenced site.
4. The extent of involvement in the above referenced site by Mr. Ralph Medley and Mr. Weatherford.

For the above, please describe the types of records that you or your company maintained of the transactions at the Medley site, including the date of the records, the author of the records, the current location and custodian of the records and all efforts that were taken to identify these records. Pursuant to Section 103 of CERCLA, it is unlawful for any person knowingly to destroy, mutilate, erase, dispose of, conceal, or otherwise render unavailable or unreadable or falsify any records.

In addition to the above information, if you or your company is privately insured against releases of hazardous wastes and substances as a result of the handling of such materials, please inform us of the existence of such insurance and provide us with copies of all insurance policies in effect during the period of activity in question.

The above information must be sent to the following address within fifteen (15) calendar days of your receipt of this letter.

Mr. Barry Allen
Assistant Regional Counsel
U.S. Environmental Protection Agency
345 Courtland St., N.E.
Atlanta, GA 30365
(404) 881-2641

Please direct any technical questions that you may have to either Mr. Allen or Ms. Giezelle Bennett of my compliance staff at (404) 881-2234.

Under Section 3008 of RCRA, 42 U.S.C. 6928, failure to comply with this request may result in an order requiring compliance or a civil action for appropriate relief. Section 3008 provides for civil penalties. Failure to comply with this request under Section 104 of CERCLA may result in a civil enforcement action being brought against you by EPA.

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EPA regulations governing confidentiality of business information are set forth in Part 2, Subpart B of Title 40 of the Code of Federal Regulations. For any portion of the information submitted which is entitled to confidential treatment, a confidentiality claim may be asserted in accordance with 40 CFR Section 2.203(b). If EPA determines that the information so designated meets the criteria set forth in 40 CFR Section 2.200, the information will be disclosed only to the extent, and by means of the procedures specified in 40 CFR Part 2, Subpart B. EPA will construe the failure to furnish a confidentiality claim with response to this letter as a waiver of that claim, and information may be made available to the public by EPA without further notice.

The factual and legal discussions contained in this letter are intended solely for notification and edification purposes. They are not intended to, do not, and may not be relied upon as a final Agency position on any matter set forth herein.

Due to the seriousness of the problem at this site and the attendant legal ramifications, the Agency strongly encourages you to submit a written response within the time frame specified herein. We hope that you will give these matters your immediate attention.

Sincerely yours,

/s/ Thomas D. Devine

Thomas D. Devine, Director
Waste Management Division

cc Jim Wilkey
SCDREC

bcc: Larry Weiner WH-527
OWPE

Marcia English
ORC

Barry Allen
ORC

4WD-ER
Bennett

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Green

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Allen

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Stonebraker

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Smith

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Devine

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12/5/84